

ATTACHMENT F-1

ATTACHMENT F-1 - PLAINTIFF WITNESS LIST

1. Plaintiff reserves the right to call witnesses for rebuttal as needed.
2. Witnesses who shall be called at trial (live and/or by deposition):

Fact witnesses

Jennifer Coker, c/o Grant Law Office

Ms. Coker is the Plaintiff in this action. She will testify regarding her medical care and treatment, as well as the surrounding and related circumstances, the nature, extent, and severity of her injuries and suffering; the physical and mental pain, suffering and discomfort associated with the injuries, the impact of the injuries on her life, including without limitations, the ongoing emotional and physical impact on her life. She will also testify regarding recommendations from her physicians that the filter and fragments not be removed due to the risks associated with same. Lastly, she will testify consistent with her deposition in this matter.

Jason Levy, M.D., Northside Radiology, 1000 Johnson Ferry Rd., Atlanta, GA 30342
Dr. Levy is an interventional radiologist who will testify regarding his placement of the Recovery filter into Plaintiff. Plaintiff further anticipates Dr. Levy will testify consistent with his medical records and with his deposition taken in this case.

Expert Witnesses:

Kush Singh, MD, c/o Grant Law Office

Dr. Singh is a radiology expert for Plaintiff and is expected to testify regarding his interpretation of numerous medical imaging, including, but not limited to the IVC filter and its fragments, and movement of such fragments. Plaintiff expects that Dr. Singh is knowledgeable regarding the matters that were the subject of his expert disclosure reports, supplemental reports, and his deposition testimony. Dr. Singh will also respond to opinions and testimony of defense experts.

Cam Patterson, M.D., c/o Grant Law Office

Dr. Patterson is a cardiology expert for Plaintiff and is expected to testify regarding Ms. Coker's medical care and causation. Plaintiff expects that Dr. Patterson is knowledgeable regarding the matters that were the subject of his expert disclosure

reports, supplemental reports, and his deposition testimony. Dr. Patterson will also respond to opinions and testimony of defense experts.

3. Witnesses who may be called at trial (Live and/or by deposition)

Many of these witnesses will be included in the deposition designations to be filed on April 15, 2022. Many of the deposition clips are *brief*. These deposition clips may be reduced further upon rulings of the Court on Motions in Limine and any objections to the depositions, and as the Plaintiff further hones her trial story. Plaintiff is aware of the Court's 15-hour trial limit and will not exceed it.

Bard Employees, Former Employees, Consultants, Experts, etc.:

Sanjeeva Kalva, M.D., c/o Grant Law Office

Dr. Kalva is an Interventional Radiologist and a key opinion leader on IVC filters. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his interactions with Bard, his experience with its filter, and his deposition.

David Garcia, M.D., Professor of Medicine, University of Washington, 1959 NE Pacific Street, Seattle, WA 98195

Dr. Garcia is an associate Medical Director of Anti-Thrombotic Therapy and a professor of hematology. He is expected to testify regarding the lack of efficacy of the Recovery filter, the health hazard evaluation of December 2004, the thrombotic nature of the Recovery filter and IVC filters, determining clots that have been formed by the Recovery filter including those found in the files of Bard in 204, the Dear Doctor letters presented at this depositions, information received and information expected by physicians regarding the Recovery filter, evidenced based medicine, what is quality evidence as it relates to efficacy and safety, types of evidence, and RCT's, and risk/benefit of the Recovery and IVC filters. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his MDL reports and his deposition testimony. Dr. Garcia will also respond to opinions and testimony of defense experts.

William D. Cleary, c/o Counsel for Defendants

Mr. Cleary was a territory manager for Bard in their peripheral vascular division. Plaintiff expects that Mr. Cleary has knowledge and would testify at trial regarding the matters that were the subject of his employment with Bard, the information Bard provided and did not provide to its sales force and to physicians relating to the IVC filters marketed and sold to physicians and hospitals, and specifically what information

was provided to him and to the sales representatives regarding Bard's IVC filters and what information they would and what could have conveyed to physicians who would use those devices. Plaintiff expects that his testimony at trial will be consistent with the testimony at his deposition taken in this litigation.

William Altonaga, M.D., c/o Counsel for Defendants

Dr. Altonaga was a consultant to and acting Medical Director for C.R. Bard beginning in 2001 and into 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition in the Bard litigation.

Murray R. Asch, M.D., c/o Lakeridge Health Corporation, Director of Interventional Radiology, 580 Harwood Ave. S Oshawa, ON L1S 2J4

Dr. Asch is an Interventional Radiologist who was involved in a pilot study to assess the retrievability of the Recovery filter. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his study and work with Bard, as well as his depositions taken in the Bard litigation.

Robert M. Carr, Jr., c/o Counsel for Defendants

Mr. Carr has been an employee at BPV since 2002; prior to that, he was an employee at NMT working on filters. At BPV, he was the Program Director for Research & Development from 2002 through 2010, Director Research & Development Biopsy from 2010 through 2012, Senior Director Research & Development Biopsy & Imaging from 2013 through 2014, and Vice President International since 2015. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with NMT and Bard and his depositions taken in the Bard litigation.

David Ciavarella, M.D., c/o Counsel for Defendants

Dr. Ciavarella has been Vice President Corporate Clinical Affairs at C.R. Bard since 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and depositions he has given in the Bard litigation.

Len DeCant, c/o Counsel for Defendants

Mr. DeCant was Vice President Research & Development for BPV from 2002 to 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and the depositions he has given in the Bard litigation.

David Dimmit, c/o Counsel for Defendants

Mr. Dimmit is the Vice President and Group Controller at C.R. Bard; Plaintiff expects that he is knowledgeable regarding matters that are/were subject to his employment with Bard and his deposition was taken on January 26, 2017 as to the defendants' financial status, assets, and net worth.

Mehdi Syed, c/o Counsel for Defendants

Mr. Syed is the Vice President of Operations at Becton Dickinson and was designated by Bard to testify on the subject notices for the deposition relating to punitive damages and Bard's financial condition; Plaintiff expects that he is knowledgeable regarding matters that are/were subject to his employment with Bard and his deposition was taken on March 2, 2018, as to Defendants' financial status, assets, and net worth.

Mary Edwards, c/o Counsel for Defendants

Ms. Edwards was Vice President Regulatory Affairs/Clinical Affairs at C.R. Bard from 1999 to 2005. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken in the Bard litigation.

Janet Hudnall, c/o Counsel for Defendants

Ms. Hudnall was an employee at BPV from 1998 to 2008, and has recently become employed by Bard again; she held positions as Product Development Engineer, Product Manager, and Marketing Manager. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken in the Bard litigation.

Brian Hudson, c/o Counsel for Defendants

Mr. Hudson was an employee at BPV from 1999 to 2012; he held positions as Quality Engineer, Senior Risk Manager, and Associate Director Quality Assurance. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken in the Bard litigation.

Daniel Orms, c/o Counsel for Defendants

Mr. Orms was an employee of BPV from 1997 through 2012 as a Sales Representative, District Manager, and Regional Manager. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken in the Bard litigation.

Frederick B. Rogers, M.D., c/o Counsel for Defendants

Dr. Rogers was the author of a large study establishing that IVC filters do not reduce the rate of PE in trauma patients. Plaintiff further expects that he is knowledgeable regarding the matters that were the subject of his deposition in the Bard litigation.

Gin Schulz, c/o Counsel for Defendants

Ms. Schulz was Vice Present Quality Assurance at BPV from 2005 to 2011 and in the Quality Assurance department at C.R. Bard since 2011, including as Vice President Quality Assurance. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken in the Bard litigation.

Carol Vierling, c/o Counsel for Defendants

Ms. Vierling was the Director, Regulatory Affairs at BPV from 1994 through 2002. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken in the Bard litigation.

Alison Walsh, c/o Counsel for Defendants

Ms. Walsh was a sales representative at Bard from 2003 through 2006. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken in the Bard litigation.

Steve Williamson, c/o Counsel for Defendants

Mr. Williamson has been President at BPV since 2012. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on September 7, 2016, in the Bard litigation.

Natalie Wong, c/o Counsel for Defendants

Ms. Wong has been an employee of BPV since 2004; she has held positions as Quality Engineer, Field Assurance Quality Engineering Manager, Quality Engineering Manager, and Senior Quality Engineer, New Product Development. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken in the Bard litigation.

Brian Barry, c/o Counsel for Defendants

Mr. Barry was the Vice President Regulatory/Clinical Affairs for Bard Access Systems from 1994 through 1997, Vice President Corporate Regulatory Affairs for C.R. Bard from 1997 through 2000, and Vice President of Regulatory Affairs and Clinical Affairs

for C.R. Bard from 2003 to 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken in the Bard litigation.

Gary S. Cohen, M.D., Temple University, Medicine Education and Research Building (MERB), 3500 N. Broad Street, Philadelphia, PA 19140

Dr. Cohen is an Interventional Radiologist at Temple University Hospital. He was a consultant and key opinion leader for Bard on IVC filters. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his deposition taken on January 25, 2017, in the Bard litigation.

Robert Cortelezzi, c/o Counsel for Defendants

Mr. Cortelezzi was an employee at BPV from approximately 1990 to 2008; he was a Regional Manager from 2004 through 2008. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken in the Bard litigation.

Kay Fuller, c/o Counsel for Defendants

Ms. Fuller was Senior Regulatory Specialist at BPV from 1999 through 2004. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken in the Bard litigation.

Brooke Gillette, c/o Counsel for Defendants

Ms. Gillette was sales representative at C.R. Bard from 2003 through 2006. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken in the Bard litigation.

Holly Glass, c/o Counsel for Defendants

Ms. Glass was Vice President Government & Public Relations at C.R. Bard from 2002 through 2009. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken in the Bard litigation.

Jason Greer, c/o Counsel for Defendants

Mr. Greer was a Sales Representative and then District Manager at BPV from 1999 through 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken in the Bard litigation.

John Lehmann, M.D., c/o Counsel for Defendants

Dr. Lehman was Group Medical Director and Vice President of Medical Affairs for C.R. Bard from 1991 to 1995; he was a consultant and acting Medical Director for C.R. Bard in 2003 and 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken in this case and the Bard litigation.

John McDermott, c/o Counsel for Defendants

Mr. McDermott was President of BPV from 1996 through 2006. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken in the Bard litigation.

Alex Tessmer, c/o Counsel for Defendants

Mr. Tessmer was an employee and engineer at BPV in the Research & Development department from 1997 through 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on June 12, 2013, in the Bard litigation.

Doug Uelmen, c/o Counsel for Defendants

Mr. Uelmen was an employee at C.R. Bard and then BPV from approximately 1981 through 2005; he was Vice President Quality Assurance at BPV from 2003 through 2005. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken in this case and in the Bard litigation.

John Van Vleet, c/o Counsel for Defendants

Mr. Van Vleet has been the Vice President Regulatory Affairs/Clinical Affairs at BPV since 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken in the Bard litigation.

John Weiland, c/o Counsel for Defendants

Mr. Weiland has been the President and Chief Operating Officer of C.R. Bard throughout the relevant time period. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken in the Bard litigation.

Mark Wilson, c/o Counsel for Defendants

Mr. Wilson worked in the Sales department at BPV from 2006 through 2010 as a sales training manager. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken in the Bard litigation.

Moni Stein, M.D., c/o Counsel for Defendants

Dr. Stein is an interventional radiology expert for Defendants. Plaintiff expects her testimony at trial will be consistent with her deposition testimony in the Bard litigation.

Christine L. Brauer, Ph.D., c/o Counsel for Defendants

Dr. Brauer is Defendants' expert in the field of regulatory affairs. She is expected to testify consistent with her depositions taken in the Bard litigation.

Mark W. Moritz, M.D., c/o Counsel for Defendants

Dr. Moritz is one of Defendant's vascular surgery experts. He is expected to testify consistent with his deposition in the Bard litigation.

Christopher Ganzer, c/o Counsel for Defendants

Mr. Ganzer is the former Director, Quality Assurance, Bard urological division. He is expected to testify consistent with his deposition in the Bard litigation.

Donna-Bea Tillman, PhD. MPA, Senior Consultant, Biologics Consulting, 1555 King Street, Ste. 300, Alexandria, VA 22314

Dr. Tillman is Defendants' expert in the field of regulatory affairs. She is expected to testify consistent with her depositions taken in the Bard litigation.

Treating Physicians:

The following treating physicians may testify regarding their examinations, care, treatment, observations, differential diagnoses, and diagnoses of Plaintiff, consistent with their medical records:

Stephanie Eaton, M.D. (pulmonologist), 960 Johnson Ferry Road, NE, Suite 500, Atlanta, GA 30342

Plaintiff further anticipates Dr. Eaton will testify consistent with her deposition taken in this case.

Paul Boyce, M.D. (pulmonologist), Pulmonary & Critical Care of Atlanta, 960 Johnson Ferry Road NE, Suite 500, Atlanta, GA 30342

Howard Silverboard, M.D. (pulmonologist), Pulmonary & Critical Care of Atlanta, 960 Johnson Ferry Road NE, Suite 500, Atlanta, GA 30342

John Puskas, M.D. (cardiologist), 1111 Amsterdam Ave., New York, NY 10025
Plaintiff further anticipates Dr. Puskas will testify consistent with his deposition taken in this case.

Kristina Bowen, M.D. (hematologist), Georgia Cancer Specialists, Administrative Annex, 1835 Savoy Drive, Atlanta GA 30341

Arum Chervu, M.D. (vascular surgeon), Vascular Surgical Associates 61 Whitaker Street, Suite 2100, Marietta, GA. 30060

John Sparti, D.O. (internal medicine), Dallas Family Practice Center, 318 Main St., Dallas, GA 30132

Plaintiff further anticipates Dr. Sparti will testify consistent with his deposition taken in this case.

Preethi Natarajan, M.D. (neurologist), Douglas Neurology Associates, 4586 Timber Ridge Dr., Douglasville, GA 30135

Steven Eisenberg, M.D. (cardiologist), 1100 Johnson Ferry Road Center Pointe 2, Suite 450, Atlanta, GA 30342

Mujeeb Jan, M.D. (cardiologist), Tanner Heart & Vascular, 690 Dallas Highway, Suite 104, Villa Rica, GA 30180

Blake Spain, M.D. (pulmonologist), 2000 Health Park Drive, ICC/HCA Healthcare, Brentwood, TN 37027

Alan Plummer, M.D. (pulmonologist), Emory Healthcare, 1365 Clifton Rd., Atlanta, GA 30322

Aaron Cann, M.D. (radiologist), Quantum Radiology, 790 Church St., Suite 400, Marietta, GA 30060